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22 **UNITED STATES DISTRICT COURT**
23 **CENTRAL DISTRICT OF CALIFORNIA**

24 Consumer Financial Protection Bureau,
25 Plaintiff,
26 v.

27 Najia Jalan, *et al.*

Case No. SACV12-2088AG (ANx)

**ORDER TO SHOW CAUSE WHY
CONTEMPT DEFENDANTS NAJIA
JALAN, KARI S. SIMMONS, AND UNMPC
–NCAC BT SHOULD NOT BE HELD IN
CONTEMPT OF COURT AND BE
SUBJECT TO SANCTIONS**

1 Upon review and consideration of Plaintiff Consumer Financial Protection
2 Bureau's Motion for an Order to Show Cause Why Najia Jalan, Kari S. Simmons, and
3 UNMPC-NCAC BT Should Not Be Found in Contempt for Their Violations of This
4 Court's Orders ("Motion"), including the December 4, 2012, *Ex Parte* Temporary
5 Restraining Order ("TRO") and the December 14, 2012, Stipulated Preliminary
6 Injunction With Asset Freeze, Appointment of Receiver, and Other Equitable Relief
7 ("PI") (collectively, "Orders"),
8

9 IT IS ORDERED as follows:

- 10 1. Defendant Najia Jalan (a/k/a Sarah Johnson, Sarah or Sara St. John, Sarah
11 Kim, Najia Jalah, Sarah John, Sarah Love, or Najia Ebrahimi, and d/b/a
12 National Legal Help Center, NationalLegalHelp.com, National Legal
13 Assistance, Legal Modification Firm CP, First Class Doc Prep, Williams
14 Law Center JW, Williams Litigation Center / Cash Entertainment and Najia
15 Jalan) ("Jalan") and non-parties Kari S. Simmons ("Simmons") and
16 UNMPC-NCAC BT ("UNMPC"), (collectively the "Contempt
17 Defendants"), shall appear in person before this Court for a hearing to be
18 conducted on the 24th day of June, 2013, at 10 am in Courtroom 10D of this
19 Court located at 411 West Fourth Street, Room 1053, Santa Ana, California,
20 and shall there and then show cause as to why each of them should not be
21 held in contempt of court for violations of the Court's Orders as described in
22 the Motion and why an order granting the following relief ("Contempt
23 Order") should not be issued against them:

- 24 a. holding Jalan in contempt of Court for violation of the TRO and PI;
25 b. holding Simmons and UNMPC in contempt of Court for violation of
26 the PI;
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1 c. requiring Jalan to purge her contempt of Court by doing all of the
2 following: (i) immediately ceasing any representations prohibited by
3 Section I of the Orders; (ii) immediately ceasing the solicitation or
4 collection of advance fees in violation of Section III of the Orders;
5 (iii) immediately disabling all websites used for advertising mortgage
6 assistance relief services that contain prohibited representations,
7 pursuant to Section V of the Orders, and notifying counsel for the
8 Bureau of any other internet website operated or controlled by any
9 Contempt Defendant; (iv) immediately ceasing to cash, negotiate,
10 endorse, transfer, or receive any value for any checks written by
11 consumers, customers, or clients to UNMPC, NLHC, or any other
12 entity; (v) immediately remitting to the NLHC Receivership at least
13 \$128,500, for which the Contempt Defendants are jointly and
14 severally liable, and any other proceeds of illegal advance fees or
15 other funds taken from consumers whether in the name of UNMPC or
16 otherwise, whether in tangible or intangible form, and all property into
17 which those funds have been converted, whether held in the name of
18 UNMPC, Najia Jalan, Kari S. Simmons, or a third party; (vi)
19 immediately ceasing misuse or benefit received from NLHC customer
20 information according to Section XXII of the Orders; (vii)
21 immediately providing copies of the PI to all successors, assigns,
22 officers, employees, independent contractors of the former NLHC or
23 UNMPC and, as required by Section XXVII of the PI; (viii)
24 immediately remitting to the NLHC Receivership at least the \$12,500
25 she dissipated immediately and any other assets she has dissipated in
26 violation of Section VII of the TRO; (ix) immediately complying with
27 Section IX of the Orders by producing the required financial
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1 statements and accounting; (x) immediately producing an accounting
2 of foreign assets and repatriating them according to Section XI of the
3 Orders; and (xi) providing a sworn statement to Bureau counsel within
4 7 days of entry of the Order that she has done so or be the subject of
5 an immediate bench warrant directing the United States Marshall to
6 immediately take her into custody and incarcerate her until she has
7 purged her contempt;

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9 d. requiring Simmons to purge her contempt of Court by doing all of the
10 following: (i) immediately ceasing any representations prohibited by
11 Section I of the Orders; (ii) immediately ceasing the solicitation or
12 collection of advance fees in violation of Section III of the Orders;
13 (iii) immediately disabling all websites used for advertising mortgage
14 assistance relief services that contain prohibited representations,
15 pursuant to Section V of the Orders, and notifying counsel for the
16 Bureau of any other internet website operated or controlled by any
17 Contempt Defendant; (iv) immediately ceasing to cash, negotiate,
18 endorse, transfer, or receive any value for any checks written by
19 consumers, customers, or clients to UNMPC, NLHC, or any other
20 entity; (v) immediately remitting to the NLHC Receivership at least
21 \$128,500, for which the Contempt Defendants are jointly and
22 severally liable, and any other proceeds of illegal advance fees or
23 other funds taken from consumers whether in the name of UNMPC or
24 otherwise, whether in tangible or intangible form, and all property into
25 which those funds have been converted, whether held in the name of
26 UNMPC, Najia Jalan, Kari S. Simmons, or a third party; (vi)
27 immediately ceasing misuse or benefit received from NLHC customer
28 information according to Section XXII of the Orders; (vii)

1 immediately providing copies of the PI to all successors, assigns,
2 officers, employees, independent contractors of the former NLHC or
3 UNMPC and, as required by Section XXVII of the PI; (viii)
4 immediately producing a financial statement and accounting to, *inter*
5 *alia*, enable the Bureau to locate any assets derived from her
6 contempt; (ix) immediately producing an accounting of foreign assets
7 and repatriate them; and (x) providing a sworn statement to Bureau
8 counsel within 7 days of entry of the Order that she has completed all
9 of the items listed above so or incur a *per diem* fine of \$10,000 until
10 she has purged her contempt.
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- 12 e. requiring UNMPC to purge its contempt of Court by doing all of the
13 following: (i) immediately ceasing any representations prohibited by
14 Section I of the Orders; (ii) immediately ceasing the solicitation or
15 collection of advance fees in violation of Section III of the Orders;
16 (iii) immediately disabling all websites used for advertising mortgage
17 assistance relief services that contain prohibited representations,
18 pursuant to Section V of the Orders, and notifying counsel for the
19 Bureau of any other internet website operated or controlled by any
20 Contempt Defendant; (iv) immediately ceasing to cash, negotiate,
21 endorse, transfer, or receive any value for any checks written by
22 consumers, customers, or clients to UNMPC, NLHC, or any other
23 entity; (v) immediately remitting to the NLHC Receivership at least
24 \$128,500, for which the Contempt Defendants are jointly and
25 severally liable, and any other proceeds of illegal advance fees or
26 other funds taken from consumers whether in the name of UNMPC or
27 otherwise, whether in tangible or intangible form, and all property into
28 which those funds have been converted, whether held in the name of

1 UNMPC, Najia Jalan, Kari S. Simmons, or a third party; (vi)
2 immediately ceasing misuse or benefit received from NLHC customer
3 information according to Section XXII of the Orders; (vii)
4 immediately providing copies of the PI to all successors, assigns,
5 officers, employees, independent contractors of the former NLHC or
6 UNMPC and, as required by Section XXVII of the PI; and (viii),
7 providing a sworn statement to Bureau counsel within 7 days of entry
8 of the Order that it has completed all of the items listed above.
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- 10 2. Written opposition or response to the Motion shall be filed with the Court
11 and served on counsel for the Bureau and counsel for the Receiver on or
12 before June 3, 2013;
- 13 3. Reply to any written opposition or response to the Motion may be filed by
14 the Bureau and served on the opposing party and all parties to this action on
15 before June 10, 2013;
- 16 4. Service of this Order to Show Cause shall be effectuated by the Bureau on
17 Defendant and Contempt Defendant Najia Jalan by service of this Order by
18 email or overnight mail service for receipt by no later than May 20, 2013;
- 19 5. Service of this Order to Show Cause shall be effectuated by the Bureau on
20 Contempt Defendant Kari S. Simmons by email or overnight mail service
21 for receipt by no later than May 20, 2013;

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1 6. Service of this Order to Show cause shall be effectuated by the Bureau on
2 Contempt Defendant UNMPC by service of this Order on Kari S. Simmons,
3 its registered representative, by email or overnight mail service for receipt
4 by no later than May 20, 2013.



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7 Dated: May 16, 2013

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9 United States District Judge
10 Andrew J Guilford
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